UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff

٧.

CRIMINAL NO. 19-431 (PAD)

JULIA BEATRICE KELEHER,

Defendant

MOTION TO RESTRICT REPLY TO UNITED STATES' RESPONSE IN OPPOSITION TO REQUEST TO MODIFY CONDITIONS

TO THE HONORABLE COURT:

COMES NOW Defendant Julia Beatrice Keleher, by and through the undersigned counsel, and moves the Court for leave to file her reply to the *United States of America's Response in Opposition to Request to Modify Conditions* (Docket No. 64) as a parties-only document to which only she, the United States, her codefendants, and the Court may have access, as the reply delves into the same issues raised in her prior Motion to Modify Conditions of Release (Docket No. 61), which the Court permitted to be filed with the same manner of restriction requested herein. See Docket No. 66.

WHEREFORE, Defendant respectfully requests the Court grant the instant motion.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the

CM/ECF system which will send a copy and notification of filing to all counsel of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of July, 2019.

McConnell Valdés LLC Attorneys for Julia Keleher

By:

s/Maria A. Dominguez
Maria A. Dominguez
USDC-PR No. 210908
madt@mcvpr.com

s/ Javier Micheo Marcial
Javier Micheo-Marcial
USDC-PR No. 305310
jfmm@mcvpr.com

270 Muñoz Rivera Avenue 9th Floor Hato Rey, Puerto Rico 00918 E-mail: jfmm@mcvpr.com